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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 IN AND FOR THE COUNTY OF SAN FRANCISCO
13

14 RAYTHEON COMPANY,

15 Plaintiff,

16 v.

17 CERTAIN UNDERWRITERS AT LLOYD'S,
18 LONDON, et al.

19 Defendants.
20

No. 950755

DECLARATION OF BEVERLY
CHARLES "BEV" McCONNELL
FORMER RAYTHEON EMPLOYEE
FROM 1961-1985

21 I, Beverly Charles McConnell declare:

22 1. My name is Bev McConnell and I was employed by Raytheon to work at
23 its semiconductor manufacturing facilities at 415 Middlefield Avenue, 350 Ellis Street and
24 Moffett Boulevard facilities in Mountain View, California for 25 years, from 1961 until my
25 retirement in 1985.

26 2. I joined Raytheon at the age of 41 after a 20 year career as a Navy pilot
27 serving in both World War II and the Korean War.

28 3. My first position at Raytheon was as a production technician at the 350
Ellis Street facility. Eventually I was promoted to a line mechanic under the supervision of
Bruce Buchanan, a position I held until sometime between 1967 and 1970. As a line mechanic I
worked with Hank Perkins and Bob Reagan, who were high-vacuum specialists.

1 4. Sometime between 1967 and 1970, the transistor manufacturing
2 operations were moved to a facility on Moffett Boulevard. Later these operations were moved
3 to 415 Middlefield Road. Raytheon eventually closed operations at on Middlefield Road in
4 about 1982 or 1983, and I returned to the 350 Ellis Street and worked as lead mechanic
5 reporting to ~~Bruce Buchanan~~ ^{BOB REAGAN} *BRM*

6 Dumping of Slurry Waste at 350 Ellis Street

7 5. In the early 1960s while working as a production technician I regularly
8 observed Raytheon maintenance employees at 350 Ellis Street facility remove slurry from the
9 slicing machines into a large portable tank, wheel the tank outside on a dolly to the open field
10 behind the facility. It is my understanding that the slurry contained TCE or alcohol.

11 6. On a number of occasions I witnessed the aftermath of the dumping of
12 waste slurry from the slicing machines in the open field. There was a damp, dark gray pile of
13 slurry covering an area of about 10 feet by 15 feet. I have marked this location on the attached
14 photo Pacific Aerial Surveys #AV-2664-8-8. I am aware that slurry waste from the lapping
15 machines, which I also believe contained TCE, was also dumped in the same location in the open
16 field.

17 Dumping of Chemicals and Solvents at 415 Middlefield Road

18 7. For most of the decade of the 1970s, while I was a maintenance
19 supervisor in the transistor department at 415 Middlefield Road facility, I and the Raytheon
20 employees in my shop routinely dumped beakers of solvents onto the field behind the facility. I
21 have marked this location on the attached photo Pacific Aerial Surveys AV-2664-8-8. We
22 dumped as infrequently as once a day and sometimes as often as six times a day, depending on
23 production levels.

24 8. I specifically recall that Dick Duncan, Owen Cowdell and Pat Wilson
25 dumped solvents to the ground during the time operations were located at the 415 Middlefield
26 Road facility.

27 9. The solvents that we dumped to the ground at that facility included:

28
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EMPLOYEE FROM 1961-1985

[SFDOC:503-004-310390]

1 isopropyl alcohol, methyl alcohol, acetone, methyl ethyl ketone, and xylene.

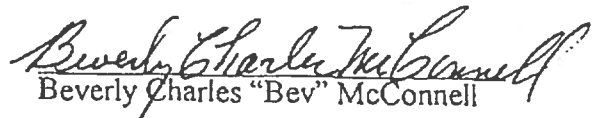
2 10. I and my co-workers at 415 Middlefield Road disposed of solvents to the
3 ground outside the building because it was convenient, and because we did not want to dispose
4 of incompatible, potentially combustible solvents down the drain inside the facility. I believe in
5 1971 or 1972 the City of Mountain View inspected our facility and told Raytheon to cease
6 disposing of incompatible chemicals down the sink. However, there were no solvent collection
7 tanks at 415 Middlefield Road, so as a result, we dumped the solvents in a dumpster at the rear
8 of the building or to the ground.

9 Disposal of Waste Solvents in Dumpster

10 11. I recall that the majority of solvents were collected in 5-gallon cans which
11 were sealed and tossed in a dumpster behind the building. It is my understanding that the City of
12 Mountain View's municipal garbage disposal company picked up the canisters of waste solvents
13 as well as canisters of TCE or TCA slurry and photo-resist. I believe these canisters were
14 ultimately dumped at the municipal landfill.

15 I certify under penalty of perjury and under the laws of the State of California
16 that the foregoing is true and correct and that if called to do so, I could and would competently
17 testify thereto.

18 Executed this 22 day of January 1998 in Byron, California.

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21 Beverly Charles "Bev" McConnell
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EMPLOYEE FROM 1961-1985

ISFDOC:503-004-3103901